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Dated: January 26, 2006

Signature:

*Lisa Gentry*  
(Lisa Gentry)

Docket No.: 55025-00003USPT  
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:  
Yugao Zhang et al.

Application No.: 10/073445

Art Unit: 3765

Filed: February 11, 2002

Examiner: I. Izaguirre

For: WRINKLE FREE GARMENT AND METHOD  
OF MANUFACTURE

SUBMISSION OF ADDITIONAL DOCUMENTATION AND PRIOR ART

MS Amendment  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

COMMENTS

Assignee Esquel Enterprises, Ltd. ("Esquel") is a defendant in certain litigation with TALTECH Limited ("TALTECH") in a case styled *TALTECH Limited v. Esquel Enterprises, Ltd.*, Civil Action No. C04-974Z in the Western District of Washington, Seattle Division (the "Litigation").

In the Litigation, TALTECH asserts that Esquel infringes two patents allegedly owned by TALTECH; Esquel denies infringement, and further asserts that the patents-in-suit are invalid. Esquel's invalidity allegations are based in part upon prior art to the TALTECH patents-in-suit.

Counsel for TALTECH has contacted the undersigned in a letter dated January 12, 2006 (the "Letter"). A true and correct copy of the Letter is attached hereto as Exhibit A. Counsel for TALTECH makes the erroneous statement of law that if Esquel asserts that any of the 663 references are relevant to the TALTECH patents, then they are necessarily material

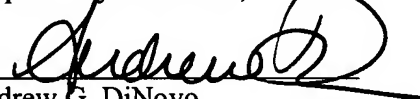
under Rule 56 to the prosecution of the instant application. While that statement is clearly false, the undersigned and Assignee fully anticipate that based upon the Letter, TALTECH plans to assert inequitable conduct seeking to render any patent issuing from the instant application unenforceable. It is further evident that no matter which subset of the 663 references are disclosed, TALTECH will likely assert that other, more material references were withheld.

Consequently, to avoid any such assertion of abrogation of duty under Rule 56, no matter how meritless, Applicant submits herewith a listing of all the references from the Litigation (attached as Exhibit B), and includes herewith a CD (attached as Exhibit C) containing those references, including non-patent prior art and foreign references.

The undersigned and Assignee regret any disruption the foregoing may cause to the ongoing prosecution of the instant case, but believe that this action is necessitated based upon the foregoing facts to ensure that there can be no questions raised regarding full compliance with Rule 56. We respectfully urge that the issuance of the foregoing patent should not be unduly delayed based upon the additional prior art collected relative to the TALTECH patents at issue in the Litigation. If the Examiner would like to discuss this matter further, the Examiner is invited to contact the undersigned.

Dated: January 26, 2006

Respectfully submitted,

By   
Andrew G. DiNovo

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